

1 L. Scott Keehn (SBN 61691)  
Lisa L. Keehn (SBN 167696)  
2 **ROBBINS & KEEHN**  
A Professional Corporation  
3 530 "B" Street, Suite 2400  
San Diego, California 92101  
4 Telephone: (619) 232-1700

5 Attorneys for Debtor  
**SARA NEWSOME BURNS**

FILED

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CLERK  
U.S. BANKRUPTCY CT.  
SO. DIST. OF CALIF.

8 **UNITED STATES BANKRUPTCY COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

11 In re:  
12 **SARA NEWSOME BURNS**, an individual,  
13  
14 Debtor.

CASE NO. 99-33191-B7

DECLARATION OF L. SCOTT KEEHN  
RE: SUPPLEMENTAL EVIDENCE  
(RECENT DEVELOPMENTS)

Date: May 30, 2000  
Time: 11:00a.m.  
Dept: 4  
Hon. Peter W. Bowie

18  
19 I, L. Scott Keehn declare as follows:

20 1. I am an attorney at law licensed to practice law in the State of California, and admitted  
21 to practice before the United States District Court for the Southern District of California. I am also  
22 a shareholder in the firm of Robbins & Keehn, a Professional Corporation, attorneys of record for Sara  
23 N. Burns, the Debtor in the above entitled bankruptcy proceedings. I am the shareholder in charge of  
24 this engagement, and the attorney within the Firm most familiar with the engagement and matters  
25 related to it.

26 2. Attached hereto and marked Exhibit 1 and incorporated herein by this reference is a  
27 copy of correspondence which I received from John G. Rowe, M.D. on or about May 2, 2000. As  
28 more fully appears from the exhibit itself, it identifies the rate at which the Debtor will incur litigation

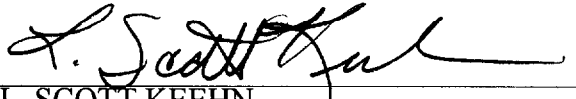
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1 expenses if, and to the extent that Dr. Rowe, her primary treating physician, is required to give  
2 testimony in connection with the matters now before the Court.

3 3. I have first hand knowledge of all of the foregoing, and if called as a witness could, and  
4 would, testify in the manner herein above set forth.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed this 5<sup>th</sup> day  
6 of May, 2000, at San Diego, California.

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9 L. SCOTT KEEHN

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